UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE:) Bankr. No. 15-24752 CMB
JEWEL J. OUTLAW,)
) Chapter 13
Debtor.)
) Docket No. 80
CITIZEN'S BANK,) Related to Docket No.
)
Movant,) Hearing Date & Time:
)
vs.) Claim No. 16
)
JEWEL J. OUTLAW AND)
RONDA J. WINNECOUR,)
CHAPTER 13 TRUSTEE,)
)
Respondents.)

DECLARATION OF MORTGAGE PAYMENT CHANGE

And Now, comes the Debtor, Jewel J. Outlaw , by and through her attorney, who respectfully represents the following:

- 1. On or about December 31, 2015, Debtor filed for protection under Chapter 13 of the U.S. Bankruptcy Code.
- 2. This Notice is being filed to notify the Chapter 13 Trustee of the change in mortgage payment amount.
- 3. Citizen's Bank filed a Notice of Mortgage Payment Change. The monthly mortgage payment of \$225.98 is being **increased** to \$241.57 effective 4/28/2020.

WHEREFORE, the Debtor requests that this Honorable Court permit the Chapter 13 Trustee to immediately make the monthly mortgage payment with the next distribution in the effective amount.

Respectfully submitted.

/s/ Rodney D. Shepherd
Rodney D. Shepherd, Esquire
Attorney for the Debtor
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CERTIFICATE OF SERVICE

I, Rodney D. Shepherd, attorney for the Debtor, hereby certifies that a true and correct copy of the Declaration of Mortgage Payment Change was served on the 7th day of April, 2020, by Electronic Filing and U.S. Mail, first class, upon the following:

Ronda J. Winnecour, Esquire Chapter 13 Trustee cmecf@chapter13trusteewdpa.com Citizens Bank Attn: Jennifer L. Dellatore Bankruptcy Department One Citizens Bank Way Mail Stop JCA115 Johnston, RI 02919

By: /s/ Rodney D. Shepherd Rodney D. Shepherd Attorney for the Debtor PA I.D. No. 56914 rodsheph@cs.com 2403 Sidney Street Suite 208 Pittsburgh, PA 15203 412 471-9670